

**The respondent, F.E. Brody, is a currently licensed amateur (N1BBQ), a currently licensed UHF user (WPUV988), holder of a currently valid licensed RadioTelepone Operators Permit. The respondent has also been a military avionics and airborne weapons systems (radio, radar, and airborne weapons telemetry), maintenance manager, and instructor. In addition to military and personal experience, the respondent had worked and consulted for a number of high tech US companies and foreign companies and governments in the computer and communications environs and industries.**

**===BEGIN RESPONDENT'S COMMENTS===**

**I am opposed to the petitioner's request, in RM-10521, for use or a critical portion of the Amateur Service's 70cm band.**

**446.0mHz is, per the 'gentlemen's agreement' ARRL Amateur Service Band-Plan, designated as the primary "Calling Channel" on the 70cm band.**

**It is also designated as the secondary calling channel (primary is 146.52 – the 2M band Calling Channel) for the 'Wilderness Protocol', designed for search and rescue. This will become more important as more agencies and groups get involved with the new Homeland Security initiatives.**

**Amateur radio has proved its worth on numerous occasions in use during natural and man-made (i.e. Sept 11, 2001) disasters. Amateur operators have been formally recognized (by Governors, Mayors, and most recently the President of the United States) on numerous occasions for their participation and assistance to government and non-government relief agencies during times of need.**

**Usurping this valuable resource is not worth the minor convenience afforded foreign nationals (saving \$20 on a pair of FCC approved Family Radio Service [FRS] units).**

**Additionally, many other countries have similar 'Family' or 'Personal Radio Service' using different frequencies. Setting a precedence here will lead to additional requests and petitions on behalf of other nation's visitors for more of the US allocated RF spectrum.**

**The FCC already lacks sufficient resources to enforce the current use of FRS, GMRS, and the relatively new MURS type services. Unlicensed usage and interference (at times intentional and malicious) with licensed GMRS users is already a problem. There will be no way to effectively regulate or enforce the rules on yet a new class of unlicensed operators – foreign nationals.**

**UK amateurs can already attest to similar problems with PMR446 users there. Web sites commonly show users how they can easily increase the power of some of the existing PMR446 radios sold there.**

**A much more workable (and more enforceable) solution would be for the ITU members to agree on a worldwide FRS service with identical frequencies, output power, equipment specifications, and emission modes.**

**===END RESPONDENT'S COMMENTS===**